

**REQUIRED STATEMENT****TO ACCOMPANY MOTIONS FOR RELIEF FROM STAY**All Cases: Debtor(s) Vincent M. Ambrosia, Sr. Karen A. Ambrosia Case No. 18-27590 Chapter 13All Cases: Moving Creditor NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER Date Case Filed 10/1/18Nature of Relief  
Sought:☒ Lift Stay ☐ Annul Stay ☐ Other (describe) \_\_\_\_\_Chapter 13: Date of Confirmation Hearing \_\_\_\_\_ or Date Plan Confirmed 01/29/2019Chapter 7: ☐ No-Asset Report Filed on \_\_\_\_\_  
☐ No-Asset Report not Filed, Date of Creditors Meeting \_\_\_\_\_

## 1. Collateral

a. ☒ Homeb. ☐ Car Year, Make, and Model \_\_\_\_\_c. ☐ Other (describe) \_\_\_\_\_2. Balance Owed as of 07/12/2019 \$377,048.01Total of all other Liens against Collateral \$0.00

3. In chapter 13 cases, if a post-petition default is asserted in the motion, attach a payment history listing the amounts and dates of all payments received from the debtor(s) post-petition.

4. Estimated Value of Collateral (must be supplied in *all* cases) \$292,000.00, per Debtor's Schedules

## 5. Default

a. ☒ Pre-Petition Default as of petition dateNumber of months 15 Amount \$41,976.47b. ☒ Post-Petition Defaulti. ☒ On direct payments to the moving creditorNumber of months 5 Amount \$11,876.11ii. ☐ On payments to the Standing Chapter 13 Trustee

Number of months \_\_\_\_\_ Amount \_\_\_\_\_

## 6. Other Allegations

a. ☐ Lack of Adequate Protection § 362(d)(1)i. ☐ No insuranceii. ☐ Taxes unpaid Amount \$ \_\_\_\_\_iii. ☐ Rapidly depreciating assetiv. ☐ Other (describe) \_\_\_\_\_b. ☐ No Equity and not Necessary for an Effective Reorganization § 362(d)(2)c. ☐ Other "Cause" § 362(d)(1)i. ☐ Bad Faith (describe) \_\_\_\_\_ii. ☐ Multiple Filingsiii. ☐ Other (describe) \_\_\_\_\_

d. Debtor's Statement of Intention regarding the Collateral

i. ☐ Reaffirm ii. ☐ Redeem iii. ☐ Surrender iv. ☒ No Statement of Intention FiledDate: July 18, 2019/s/ Grant Simmons

Counsel for Movant